

**UNITED STATES DISTRICT COURT
DISTRICT OF MINNESOTA**

IN RE: Bair Hugger Forced Air Warming
Products Liability Litigation

MDL No. 15-2666 (JNE/DTS)

This Document Relates to:

Robert L. Winn v. 3M Company, et al.,
No.: 0:18-cv-00891-JNE-DTS

**DECLARATION OF CAROLINE WHITE IN SUPPORT OF
PLAINTIFF'S RESPONSE IN OPPOSITION TO
DEFENDANTS' MOTION TO DISMISS**

I, Caroline Thomas White, declare as follows:

1. I am an attorney at Murray Law Firm and counsel for Plaintiff Robert L. Winn in the above-captioned matter.
2. I submit this declaration in opposition to Defendants' Motion to Dismiss for Failure to Comply with Pretrial Order No. 14 [Dkt. 1572] filed on November 1, 2018.
3. Plaintiff Robert L. Winn alleges that he developed a serious infection and was forced to undergo treatment of the same as a result of the use of a Bair Hugger Forced Air Warming Blanket during an orthopedic surgery. Plaintiff's medical records indicate that a Bair Hugger device was used during his initial surgery.
4. On March 29, 2018, Plaintiff filed a Short Form Complaint in this MDL.
5. Numerous telephone calls, letters, and emails were sent to Mr. Winn in an attempt to reach him and obtain information to complete his Plaintiff Fact Sheet. These communications were made between April 2018 and November 8, 2018.

6. To date, Murray Law Firm has not received a response to these phone calls and letters in order to provide the information necessary to complete the Plaintiff Fact Sheet.

7. Since we have been unable to obtain the information necessary to complete the Plaintiff Fact Sheet for Mr. Winn's claim, we have not been able to cure the alleged deficiencies pertaining to the Plaintiff Fact Sheet that has been submitted for this case.

Pursuant to 28 U.S.C. § 1746(2), I declare under the penalty of perjury that the foregoing is true and correct.

Dated: November 8, 2018

/s/ Caroline Thomas White
Caroline T. White (La. # 36051)
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